

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DOMINGINHO POWELL,)	
Plaintiff,)	1:10-cv-7852
)	
v.)	
)	Judge Darrah
WEST ASSET MANAGEMENT, INC.,)	
Defendant.)	
)	JURY DEMANDED
)	

**MOTION TO EXTEND THE TIME TO FILE
REPLY/RESPONSE REGARDING SUMMARY JUDGMENT**

Plaintiff respectfully requests that this Court permit him three additional weeks, until December 9, 2011, to file his combined summary judgment response/reply, defendant would then have until December 30 to file the final brief. In support of this motion, plaintiff states:

1. This is a Telephone Consumer Protection Act, 47 U.S.C. §227(b) ("TCPA"), case against a debt collection agency that called plaintiff twenty-five times, without his consent.
2. Plaintiff filed for summary judgment and West filed a cross motion. Plaintiff's combined reply/response is currently due on November 16, 2011. West's final brief is currently due on November 23, 2011.
3. Although plaintiff's counsel gave priority to the drafting of the brief, other matters, including family emergencies over which counsel has no control, have prevented counsel from being able to complete the brief by the due date.
4. Plaintiff respectfully requests that this Court extend the date within which plaintiff may file by approximately three weeks, so that plaintiff's combined brief is due on

December 9, 2011, and West's final brief is due on December 30, 2011. These dates are a little longer than the previous schedule, due to Thanksgiving, Christmas and the holiday season.

5. Defendant does not oppose this motion.

WHEREFORE, plaintiff respectfully requests that this Court permit him three additional weeks, until December 9, 2011, to file his combined summary judgment response/reply, defendant would then have until December 30 to file the final brief.

Respectfully submitted,

/s/Alexander H. Burke

BURKE LAW OFFICES, LLC
155 N. Michigan Ave., Suite 9020
Chicago, IL 60601
(312) 729-5288
(312) 729-5289 (fax)
ABurke@BurkeLawLLC.com
www.BurkeLawLLC.com